

FILED

FEB 22 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

V.

EH TA NI SAY,

Defendant.

INDICTMENT

5:24 CR 00057

CASE NO.

Title 18, United States Code,
Sections 922(a)(1)(A), 922(a)(6),
924(a)(1)(D), and 924(a)(2)

JUDGE POLSTER

COUNT 1

(Engaging in the Business of Selling Firearms, 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D))

The Grand Jury charges:

1. From on or about September 8, 2022 to May 16, 2023, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant EH TA NI SAY, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNT 2

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

2. On or about September 8, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model TX22, .22 caliber pistol, serial number 1PT499457, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and

unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

3. On or about September 22, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Ruger, Model EC9S Gray, 9mm caliber pistol, serial number 461-73466, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 4

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

4. On or about September 29, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G3, 9mm caliber pistol, serial number ADA857145, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 5

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

5. On or about October 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: SCCY, Model CPX2 Gray, 9mm caliber pistol, serial number C008167, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that

Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 6

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

6. On or about November 8, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G2C, 9mm caliber pistol, serial number 1C149483, from Summit Armory, 2417 North Cleveland Massillon Road, Akron, Ohio 44333, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 7

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

7. On or about November 10, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model TH40C, .40 caliber pistol, serial number ADE424770, from Seegifts, 1289

Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 8

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

8. On or about December 4, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: ATI, Model GSG-16-M, .22 caliber rifle, serial number A954403, from Summit Armory, 2417 North Cleveland Massillon Road, Akron, Ohio 44333, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 9

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

9. On or about December 12, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Delton, Model Lima, 5.56 caliber rifle, serial number DTI-S253272, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 10

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

10. On or about December 13, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Anderson Manufacturing, Model AM-15, 5.56 caliber rifle, serial number 21225717, from Summit Armory, 2417 North Cleveland Massillon Road, Akron, Ohio 44333, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44,

Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 11

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

11. On or about December 16, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model 19, 9mm caliber pistol, serial number AGVW904, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 12

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

12. On or about December 16, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G3, 9mm caliber pistol, serial number ADJ640805, from Seegifts, 1289 Edison

Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 13

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

13. On or about December 22, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G2C, .40 caliber S&W, serial number ADK778646, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 14

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

14. On or about December 31, 2022, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model 19X, 9mm caliber pistol, serial number BYNF958, from Range USA, 812 Killian Road, Akron, Ohio 44319, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 15

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

15. On or about January 2, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Smith and Wesson, Model M&P15-22, .22 caliber rifle, serial number LBF5027, from Range USA, 812 Killian Road, Akron, Ohio 44319, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is,

ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 16

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

16. On or about January 14, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model 43X, 9mm caliber pistol, serial number BXCD592, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 17

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

17. On or about January 20, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G2C, 9mm caliber pistol, serial number ADD278438, from Range USA, 812 Killian Road, Akron, Ohio 44319, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said

dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 18

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

18. On or about January 21, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Pioneer, Model Hellpup, 7.62 caliber pistol, serial number PAC1166946, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 19

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

19. On or about January 29, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model

G45 MOS, 9mm caliber pistol, serial number BYRR276, from Summit Armory, 2417 North Cleveland Massillon Road, Akron, Ohio 44333, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 20

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

20. On or about January 29, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model 43X, 9mm caliber pistol, serial number BYXE761, from Range USA, 812 Killian Road, Akron, Ohio 44319, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 21

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

21. On or about March 10, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Delton, Model Lima, 7.62 caliber pistol, serial number B91517, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 22

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

22. On or about March 16, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model 19 GEN 5, 9mm caliber pistol, serial number AFTKO42, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is,

ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 23

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

23. On or about April 1, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: HiPoint, Model CF380, .380 caliber pistol, serial number P8188133, from Dunhams, 180 Great Oaks Trail, Wadsworth, Ohio 44281, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 24

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

24. On or about April 22, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Glock, Model 48, 9mm caliber pistol, serial number BZNS515, from Range USA, 812 Killian Road, Akron, Ohio 44319, a federally licensed dealer of firearms, did knowingly and unlawfully make and

cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 25

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

25. On or about April 25, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Heritage, Model Barkeep, .22 caliber revolver, serial number 1BH693576, from Dunhams, 180 Great Oaks Trail, Wadsworth, Ohio 44281, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 26

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

26. On or about May 13, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G3C, 9mm caliber pistol, serial number ADL923977, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 27

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

27. On or about May 13, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Ruger, Model EC9S, 9mm caliber pistol, serial number 461-5-3075, from Seegifts, 1289 Edison Street, N.W., Hartville, Ohio 44632, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did

knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 28

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

28. On or about May 16, 2023, in the Northern District of Ohio, Eastern Division, Defendant EH TA NI SAY, in connection with the acquisition of a firearm, to wit: Taurus, Model G2C, 9mm caliber pistol, serial number AEB126684, from Sporting Defense, 4106 State Route 43, Kent, Ohio 44240, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, that is, ATF Form 4473, that he was the actual buyer of said firearms, when in fact, he was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

29. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 28 are incorporated herein by reference. As a result of the foregoing offenses,

Defendant EH TA NI SAY, shall forfeit to the United States all firearms and ammunition involved in, or used in the commission of the federal firearms violations charged herein.

A TRUE BILL.

Original document- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.